

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

J.C.,

Plaintiff,

-against-

ROBERT ALLEN ZIMMERMAN a/k/a BOB
DYLAN,

Defendant.

Case No. 22-cv-00323-KPF

DECLARATION OF BRIAN C. ASCHER

I, Brian C. Ascher, hereby declare under penalty of perjury pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am a member of the bar of this Court and a partner at the law firm of Gibson, Dunn & Crutcher LLP (“Gibson Dunn”), counsel to Defendant Bob Dylan in this action. I submit this declaration in support of Defendant’s Motion for Sanctions against Plaintiff’s counsel Mr. Daniel Isaacs and Mr. Peter Gleason for repeated violations of the Court’s orders and related discovery misconduct. I have personal knowledge of the facts stated herein and, if called to testify, I could and would competently testify to these facts.

2. Attached to this declaration as **Exhibit A** is a true and correct copy of Plaintiff’s Complaint, filed on August 13, 2021, with the Supreme Court of the State of New York, New York County.

3. Attached to this declaration as **Exhibit B** is a true and correct copy of a *Rolling Stone* article dated August 19, 2021, entitled “Bob Dylan Lawsuit: Dylanologists, Accuser’s Lawyer Spar Over 1965 Whereabouts.”

4. Attached to this declaration as **Exhibit C** is a true and correct copy of Defendant's Corrected Answer to the Amended Complaint filed with the Supreme Court of the State of New York, New York County, on January 6, 2022.

5. Attached to this declaration as **Exhibit D** is a true and correct copy of counsel for Defendant's letter, dated March 4, 2022, to Mr. Isaacs and Mr. Gleason.

6. Attached to this declaration as **Exhibit E** is a true and correct copy of a letter Mr. Gleason sent on February 25, 2022 to Gibson Dunn's Managing Partner.

7. Attached to this declaration as **Exhibit F** is a true and correct copy of Mr. Isaacs' email, dated March 1, 2022, to counsel for Defendant.

8. Attached to this declaration as **Exhibit G** is a true and correct copy of Mr. Isaacs' email, dated March 10, 2022, to counsel for Defendant.

9. Attached to this declaration as **Exhibit H** is a true and correct copy Mr. Isaacs' email, dated April 18, 2022 to counsel for Defendant.

10. Attached to this declaration as **Exhibit I** is a true and correct copy of Mr. Isaacs' letter, dated May 3, 2022, to counsel for Defendant. In consideration of Plaintiff's privacy interests, the letter attachments are omitted from this exhibit, and the names of medical providers have been redacted per this Court's Individual Rule of Practice 9.A.

11. Attached to this declaration as **Exhibit J** is a true and correct copy of counsel for Defendant's email, dated June 14, 2022, to Mr. Isaacs and Mr. Gleason. In consideration of Plaintiff's privacy interests, the names of medical providers have been redacted per this Court's Individual Rule of Practice 9.A.

12. Attached to this declaration as **Exhibit K** is a true and correct copy of counsel for Defendant's letter, dated June 8, 2022 to Mr. Isaacs and Mr. Gleason.

13. Attached to this declaration as **Exhibit L** is a true and correct copy of Mr. Isaacs' email, dated June 17, 2022, to counsel for Defendant.

Executed: October 3, 2022
New York, New York

A handwritten signature in black ink, appearing to read "Brian C. Ascher", written over a horizontal line.

Brian C. Ascher